Data Management Plan
Wellman Dynamics Corporation
Creston, Iowa
USEPA ID No. IAD065218737
Revision 1

October 2006

Prepared For:

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BT^2 Project #2631

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1.0 INTRODUCTION

1.1 Purpose

This Data Management Plan (DMP) has been prepared for the Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) of the Wellman Dynamics Corporation (WDC) facility. The DMP represents a portion of the RFI Workplan for the WDC facility.

The purpose of the DMP is to outline the procedures for documenting, tracking, and presenting data gathered during the RFI.

The RFI Workplan and DMP were prepared in accordance with the requirements of the Administrative Order on Consent (Order) issued by the United States Environmental Protection Agency (USEPA) that became effective on January 23, 2004.

A complete description of the site history, operations, and environmental conditions at the facility can be found in the Final Current Conditions Report (CCR)(BT^2, 2005).

1.2 RFI Workplan Organization

This DMP is one of six documents that compose the WDC RFI Workplan. The other five Workplan component documents include:

- Project Management Plan
- Sampling and Analysis Plan/Quality Assurance Project Plan (SAP/QAPP)
- Health and Safety Plan
- Community Relations Plan
- Risk Assessment Workplan

These component documents reference each other and should be reviewed in combination to obtain a complete understanding of the proposed RFI.

1.3 Project Information

Facility Name:	Wellman Dynamics Corporation
EPA ID No:	IAD065218737

Facility Address:	1746 Commerce Road Creston, IA 50801
USEPA Project Coordinator:	Patricia Murrow ARTD/RCAP U.S. Environmental Protection Agency 901 North 5th Street Kansas City, KS 66101 913-551-7627
Facility Project Coordinator:	Joe Haller, Environmental Engineer Facility address above 641-782-8521, ext. 206
Corporate Contact:	E. Jonathan Jackson Environmental and Safety Compliance Director Fansteel, Inc. Deerbrook Corporate Center, Suite 200 570 Lake Cook Road Deerfield, IL 60015 847-689-4900, ext. 553
Consultant Contact for RFI Workplan:	Sherren Clark, P.E., P.G., Project Manager BT^2, Inc. 2830 Dairy Drive Madison, WI 53718-6751 608-216-7323

2.0 DATA DOCUMENTATION

2.1 Data Collection

The data collected from sampling, field measurements, and laboratory analysis will be documented in accordance with the Sampling and Analysis Plan/Quality Assurance Project Plan (SAP/QAPP). Each sample or field measurement will be identified by a unique code as defined in the SAP/QAPP. All ancillary data required under the SAP/QAPP will be collected and maintained with the sampling or field measurement result.

For each laboratory or field measurement result, the data record will comprise the following information:

- Unique sample or field measurement code, as described in **Sections B.2** and **B.3** of the SAP/QAPP
- Location and type of sample or field measurement

- Sampling or field measurement raw data
- Laboratory analysis ID number
- Property or component measured
- Result of analysis (e.g., concentration)
- Data flags or any other notations regarding data quality

2.2 Data Management

The data collected from sampling, field measurements, and laboratory analysis will be managed in a database and/or spreadsheet. The complete data record for each result will be entered in the database and/or spreadsheet. Data transfer from the laboratory or field may be either electronic or manual. Only data that have been verified by the data generating entity (e.g., laboratory, field team) will be added to the final results database and/or spreadsheet. Data verification will be performed in accordance with the SAP/QAPP.

Before the data are used for any tabular or graphical displays, the data record entry will be proofed by another person. The data entry person, entry date, proofing person, and proofing date will be added to the data record. Proofing will include comparing the entered or electronically transferred data with the verified hard copy data report (laboratory report or field data report) with respect to:

- Sample identification
- Parameter name
- Sample date
- Result
- Units
- Data flags or other qualifiers
- Detection and quantification limits
- Significant digits
- Other applicable information

The verified and proofed data will be validated in accordance with the SAP/QAPP. Validation will be performed by BT^2 and will include the following elements:

- Evaluation of the significance of any data flags or other qualifiers with respect to the planned use of the data

- Comparison of the data set with previous results or expected values
- Evaluation of the consistency of results (e.g., do the lab results fit expectations based on the field screening results?)
- Evaluation of field duplicate and field blank results

The outcome of the data validation process will be acceptance, qualification, or rejection of the data. Data that are rejected will not be used further in the RFI decision-making process. Data that are qualified may be suitable for limited use in the RFI provided that the qualifying limits on the data are considered and documented in the decision-making process. The need for additional data gathering to replace rejected or qualified data will be evaluated on a case-by-case basis.

3.0 DATA DISPLAYS

3.1 Tabular Displays

Sampling and field measurement results will be presented in tables in the RFI report. All results will be tabulated. Results will generally be grouped by the area of investigation and the sampling parameters. Where statistical evaluation is used, the data table will show the data reduction steps applied before the statistical calculations (e.g., calculating mean result for duplicate samples). Summary data will be tabulated if it is helpful for understanding the site conditions (e.g., total volatile organic compounds).

3.2 Graphical Displays

Graphical displays such as maps, cross sections, or graphs will be used to display the following data:

- Sampling locations and sampling grids
- Boundaries of sampling areas and areas where more data are required
- Levels of contamination at each sampling location (key parameters only, may include averages or maximums as appropriate)
- Extent of contamination
- Changes in concentration with respect to distance from the source, time, depth, or other parameters as appropriate
- Potential receptors
- Other features affecting contaminant transport (e.g., underground utilities or groundwater discharge locations)

4.0 PROJECT FILE REQUIREMENTS

In accordance with the Order, WDC will retain all data, records, and documents that relate in any way to the Order or to hazardous waste management during the term of the Order and for at least 6 years after its termination. In addition, WDC will enter into an agreement with any agents, consultants, or contractors requiring them to provide WDC with a copy of all documents produced pursuant to the Order. All documents pertaining to the Order, excluding internal WDC communication and privileged communication, will be stored by WDC at the Creston facility.

Project files for the RFI will be set up at BT^2 and will include the following information:

- Raw field data including
    - Field log books or field notes
    - Soil boring logs
    - Groundwater sampling forms
    - Well construction and development forms
    - Borehole abandonment forms
    - Chain of custody forms
    - Survey data
- Laboratory report packages including Quality Control (QC) documentation
- Project correspondence, including paper correspondence, electronic mail, and telephone conversation records
- RFI Workplan and any subsequent addenda
- Progress reports
- Photographs
- Permits
- Calculations
- Other miscellaneous information used for the RFI

The project file system will be expanded as necessary as additional information is obtained.

Some of the project file information will also be stored electronically at BT^2. Laboratory reports and major correspondence will be stored in Acrobat Portable Document Format (PDF) on the BT^2 file server.

5.0 PROGRESS REPORTING PROCEDURES

In accordance with the Order, progress reports will be submitted to USEPA on a quarterly basis. Progress reports are due by the 15th day of the month following the end of each quarter (i.e., January 15, April 15, July 15, October 15). Each quarterly report will include the following information:

- A description of the RFI activities completed during the reporting period
- Summaries of all contacts, during the reporting period, with representatives of the local community, public interest groups or State government concerning RFI activities at the facility
- Summaries of all problems or potential problems encountered during the reporting period
- Actions being taken to rectify problems
- Changes in project coordinator, principal contractor, laboratory, and/or consultant during the reporting period
- Projected work for the next reporting period
- Copies of laboratory/monitoring data received and/or generated during the reporting period
- EPA identification number (IAD065218737) on the cover or title page

6.0 REFERENCES

BT^2, Inc., 2005, Final Current Conditions Report, Wellman Dynamics Corporation, Creston, Iowa, USEPA ID No. IAD065218737, June 2005.